

DECLARATION OF DOUGLAS PLAZAK, ESQ.

I, DOUGLAS PLAZAK, ESQ., declare:

1. I am an attorney in good standing, admitted to practice law in California, and am admitted to US District Court and Bankruptcy Court, CD CA.

2. I make this Declaration in support of the Motion for Allowance and Payment of Administrative Expense of Greyson Law Center, PC (“Greyson”) regarding phone calls and emails I had with Trustee Marshack’s attorney, Christopher Celentino of Dinsmore & Shohl LLP (“Dinsmore”), for my then client, Greyson Law Center PC (“Greyson”), requesting the Chapter 11 Trustee to return Greyson’s client files (which Trustee personnel had seized from Greyson) to Greyson, and requesting that the Chapter 11 Trustee/Dinsmore restore Greyson’s access to its data and emails to which they had locked Greyson out.

3. I represented Greyson at the June 12, 2023, bankruptcy court hearing, wherein Mr. Celentino admitted that Greyson was not an alter ego of debtor LPG. (see p. 33-34 of hearing transcript, attached to the Kathleen March Declaration in support of Greyson's Motion).

4. On June 13, 2023, Mr. Celentino emailed me requesting that Gresyon provide signed retention agreements for 48 clients that had moved to Greyson from the Litigation Practice Group and other firms before the Chapter 11 Trustee/Dinsmore would return the 48 client files to Greyson. Attached hereto as Exhibit A is a true and correct copy of the June 13, 2023 sent to me by Mr.

1 Celentino. The Chapter 11 Trustee/Dinsmore/field agents had seized the 48 client
2 files (Greyson's property) from Greyson during the June 2, 2023, lockout of
3 Greyson from Greyson's offices. Additionally, the Chapter 11 Trustee/Dinsmore
4 had locked Greyson and the Greyson attorneys out of Greyson's LUNA account,
5 as well as the Greyson email accounts. The Chapter 11 Trustee/Dinsmore/field
6 agents locked the Greyson email accounts from June 2, 2023, to June 12, 2023,
7 and continuing after the June 12th court hearing.

8
9
10 5. On June 13, 2023, I had a lengthy telephone call with Mr. Celentino in
11 response to his email of that day. (See Exhibit A) He had not requested the signed
12 retention agreements during the June 12, 2023, hearing.

13
14 6. On June 20, 2023, I emailed Mr. Celentino to follow up regarding the
15 discussion we had regarding my understanding that LPG already had access to the
16 48 signed retention agreements through Greyson's Luna account, thereby
17 obviating any need for Greyson to provide the retention agreements to the Chapter
18 11 Trustee. Attached hereto as Exhibit B is a true and correct copy of the June 20,
19 2023 I sent. Further, I noted in the email that Greyson could not provide the
20 requested retention agreements because they did not yet have access to their Luna
21 account. Accordingly, I requested that the Chapter 11 Trustee/Dinsmore
22 immediately return Greyson's 48 client files. When Mr. Celentino did not respond
23 to my June 20th email, I emailed his Dinsmore colleague, Christopher Ghio, on
24 June 28, 2023 for a follow- up. Attached hereto as Exhibit C is a true and correct

1 copy of my June 28th email to Mr. Ghio. I followed up with Mr. Ghio again on
2 July 3, 2023, regarding this matter. Attached hereto as Exhibit D is a true and
3 correct copy of the my July 3rd email. On July 7, 2023, I received an email from
4 a Dinsmore associate, Gina Kripotos, providing login information to access
5 Greyson's Luna account (which was needed to access Greyson's client files).
6 Attached hereto as Exhibit E is a true and correct copy of the July 7th email.
7

9 7. During that June 13, 2023, telephone call, Mr. Celentino set forth a
10 protocol that he was wanted Greyson's attorneys to follow: He wanted Greyson's
11 attorneys to send an email to Alex Rubin, Ty Carss (Phoenix Law Group's
12 Managing Attorney), and to himself providing: (A) a priority list of clients that had
13 needs between June 14-16, 2023, 23 – 6/16/23); and (B) an additional list of all
14 clients for whom they have been assigned. He also wanted the Greyson attorneys
15 to advise: (A) if they were owed money; (B) whether they have a fee agreement
16 with either the client and/or Greyson; and (C) if so, how much was the fee
17 agreement.
18

21 I declare under penalty of perjury that the foregoing is true and correct and
22 that this Declaration is executed at Riverside, California on November 17, 2023.
23

24 
25

26 DOUGLAS PLAZAK, ESQ.
27

EXHIBIT “A”

Douglas Plazak

From: Celentino, Christopher <Christopher.Celentino@DINSMORE.COM>
Sent: Tuesday, June 13, 2023 10:37 AM
To: Douglas Plazak
Subject: FW: Confirmed Greyson's Clients List
Attachments: Greyson Client List (Signed NOT in Greyson CRM).csv

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Doug – per the Court's oral order which you and I should work to document today, we have prepared a CVS data file for the 48 clients on the above list provided to us by Han Trinh – her email below and the list attached is forwarded to you.

I am unsure if it is Scott Eadie or Jayde Trinh who serves as the counsel of record – I will leave that to them.

Please send the signed retention agreements for these 48 clients, and we will get those data files to you.

Chris.



Christopher Celentino

Partner
Dinsmore & Shohl LLP • Legal Counsel
655 West Broadway
Suite 800
San Diego, CA 92101
C (619) 218-3229 • F (619) 400-0501 O (619) 400-0519
E christopher.celentino@dinsmore.com • dinsmore.com

From: GLC Admin <Admin@greysonlawpc.com>
Sent: Friday, June 2, 2023 7:26 PM
To: Celentino, Christopher <Christopher.Celentino@DINSMORE.COM>
Subject: Confirmed Greyson's Clients List

Hello Christopher-

EXHIBIT “B”

Douglas Plazak

From: Douglas Plazak
Sent: Tuesday, June 20, 2023 3:41 PM
To: 'Celentino, Christopher'; Ghio, Christopher
Cc: Wendy Patrick
Subject: RE: Confirmed Greyson's Clients List G0990-001

Chris,

I'm following up regarding the below. As we discussed, LPG has the access to the signed retention agreements (I believe through Luna) and Greyson does not. Therefore, my assumption is there is nothing else Greyson needs to provide in order for the Chapter 11 Trustee to forward the 48 files. Assuming that's the case, please forward the 48 files at your earliest convenience. If you do require something further, please advise what you need.

Thanks,
Doug

From: Celentino, Christopher <Christopher.Celentino@DINSMORE.COM>
Sent: Tuesday, June 13, 2023 10:37 AM
To: Douglas Plazak <dplazak@rhlaw.com>
Subject: FW: Confirmed Greyson's Clients List

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Doug – per the Court's oral order which you and I should work to document today, we have prepared a CVS data file for the 48 clients on the above list provided to us by Han Trinh – her email below and the list attached is forwarded to you.

I am unsure if it is Scott Eadie or Jayde Trinh who serves as the counsel of record – I will leave that to them.

Please send the signed retention agreements for these 48 clients, and we will get those data files to you.

Chris.

Dinsmore

EXHIBIT “C”

Douglas Plazak

From: Douglas Plazak
Sent: Wednesday, June 28, 2023 4:22 PM
To: 'Ghio, Christopher'
Cc: Wendy Patrick; 'Celentino, Christopher'; Terry Zembrzuski; 'Sam Sackett'
Subject: RE: 48 Files G0990-001

Chris,

I do not believe Chris Celentino responded to the below email regarding the 48 files. This issue is different from the issue involving the four email accounts that Terry Zembrzuski corresponded with you earlier today.

If there is something that Greyson needs to provide in order for the Chapter 11 Trustee to forward the 48 files, please advise. If not, then please advise how you'd like to proceed with the transfer of the 48 files.

Thanks,
Doug

From: Douglas Plazak
Sent: Tuesday, June 20, 2023 3:41 PM
To: 'Celentino, Christopher' <Christopher.Celentino@DINSMORE.COM>; Ghio, Christopher <Christopher.Ghio@Dinsmore.com>
Cc: Wendy Patrick <wppatrick@rhlaw.com>
Subject: RE: Confirmed Greyson's Clients List G0990-001

Chris,

I'm following up regarding the below. As we discussed, LPG has the access to the signed retention agreements (I believe through Luna) and Greyson does not. Therefore, my assumption is there is nothing else Greyson needs to provide in order for the Chapter 11 Trustee to forward the 48 files. Assuming that's the case, please forward the 48 files at your earliest convenience. If you do require something further, please advise what you need.

Thanks,
Doug

From: Celentino, Christopher <Christopher.Celentino@DINSMORE.COM>
Sent: Tuesday, June 13, 2023 10:37 AM
To: Douglas Plazak <dplazak@rhlaw.com>
Subject: FW: Confirmed Greyson's Clients List

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Doug – per the Court's oral order which you and I should work to document today, we have prepared a CVS data file for the 48 clients on

EXHIBIT “D”

Douglas Plazak

From: Douglas Plazak
Sent: Monday, July 03, 2023 4:44 PM
To: 'Ghio, Christopher'
Cc: Wendy Patrick; 'Celentino, Christopher'; 'Terry Zembrzuski'; 'Sam Sackett'
Subject: RE: 48 Files G0990-001

Chris,

Please advise regarding the below at your earliest opportunity. Please let me know if you think we need to have a telephone call to discuss what needs to be done to provide the 48 files.

Thank you,
Doug

From: Douglas Plazak
Sent: Wednesday, June 28, 2023 4:22 PM
To: 'Ghio, Christopher' <Christopher.Ghio@Dinsmore.com>
Cc: Wendy Patrick <wppatrick@rhlaw.com>; 'Celentino, Christopher' <Christopher.Celentino@DINSMORE.COM>; Terry Zembrzuski <terry@virtualtoursllc.com>; 'Sam Sackett' <samuelsackett@gmail.com>
Subject: RE: 48 Files G0990-001

Chris,

I do not believe Chris Celentino responded to the below email regarding the 48 files. This issue is different from the issue involving the four email accounts that Terry Zembrzuski corresponded with you earlier today.

If there is something that Greyson needs to provide in order for the Chapter 11 Trustee to forward the 48 files, please advise. If not, then please advise how you'd like to proceed with the transfer of the 48 files.

Thanks,
Doug

From: Douglas Plazak
Sent: Tuesday, June 20, 2023 3:41 PM
To: 'Celentino, Christopher' <Christopher.Celentino@DINSMORE.COM>; Ghio, Christopher <Christopher.Ghio@Dinsmore.com>

EXHIBIT “E”

Douglas Plazak

From: Kripotos, Gina <Gina.Kripotos@DINSMORE.COM>
Sent: Friday, July 07, 2023 4:16 PM
To: Douglas Plazak
Cc: Celentino, Christopher; Serrano, Jonathan; Lissebeck, Yosina; Ghio, Christopher
Subject: Data Access- Greyson Client Files

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Doug,

Please see the login information below. This should provide you with access to the data re client files that you requested via GLC Admin. The login credentials will be valid for 2 weeks and then they will expire. Please let us know if you have any questions.

Luna CRM: <https://gs.lunapps.co/>

Login: dplazak@rhlaw.com

Password:

Best,

Dinsmore

Gina Kripotos

Associate

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